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14 Attorneys for Defendant

15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA

17  
18 SALLY TORREZ, ) Case No.: 3:17-cv-01586-JST  
19 Plaintiff, )  
20 vs. ) STIPULATION FOR AN EXTENSION OF  
21 NANCY A. BERRYHILL, ) TIME OF 60 DAYS FOR DEFENDANT'S  
22 Acting Commissioner of Social Security, ) RESPONSE TO PLAINTIFF'S MOTION  
23 Defendant. ) FOR SUMMARY JUDGMENT  
24 \_\_\_\_\_)

25 IT IS HEREBY STIPULATED, by and between the parties, through their respective  
26 counsel of record, that Defendant shall have an extension of time of an additional 60 days to  
27 respond to Plaintiff's motion for summary judgment. This is the first continuance sought by  
28 Defendant. The current due date is August 31, 2017. The new due date will be October 30,  
2017.

29 There is good cause for this request. Since the filing of Plaintiff's Motion for Summary  
30 Judgment on August 3, 2017, Defendant's counsel has been diligently addressing her full  
31 workload and was assigned additional and unanticipated matters that had immediate deadlines  
32 and could not be assigned to another attorney, including filing objections or motions in response  
33 to two district court decisions decided on July 31, 2017, and August 4, 2017, with deadlines that

1 could not be extended. Despite counsel's diligence in responding to the new matters and her  
2 remaining workload, counsel was set back in addressing her other cases, including this one.  
3 Moreover, in the next 60 days, Defendant's counsel will be addressing other cases that have  
4 previously been extended, new assignments that have deadlines that cannot be extended, as well  
5 as an Equal Employment Opportunity Commission matter involving discovery and travel for  
6 depositions and subsequent briefing, that has also been extended once. Therefore, Defendant is  
7 respectfully requesting additional time up to and including October 30, 2017, to fully review the  
8 record and research the issues presented by Plaintiff's motion for summary judgment in this case.  
9 This request is made in good faith with no intention to unduly delay the proceedings. Defendant  
10 apologizes for the delay and any inconvenience caused by the delay.

11 The parties further stipulate that the Court's Scheduling Order shall be modified  
12 accordingly.

13 Respectfully submitted,

14 Date: August 29, 2017

HOMELESS ACTION CENTER

15 *s/ Paul Kim by C.Chen\**  
16 (As authorized by e-mail on 8/29/2017)  
17 PAUL KIM  
18 Attorney for Plaintiff

19 Date: August 29, 2017

BRIAN J. STRETCH  
United States Attorney

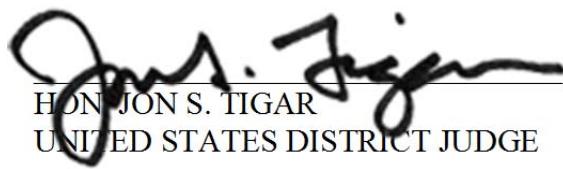
20 By *s/ Carolyn B. Chen*  
21 CAROLYN B. CHEN  
22 Special Assistant U. S. Attorney

23 Attorneys for Defendant

24 ORDER

25 APPROVED AND SO ORDERED:

26 DATED: August 29, 2017

  
27 HON. JON S. TIGAR  
28 UNITED STATES DISTRICT JUDGE